



## **OHMVR COMMISSION MEETING El Dorado County Board of Supervisors Chambers**

**September 15, 2012**

**STAFF REPORT:** Johnson Valley OHV Area – Twentynine Palms FEIS

**STAFF:** Dan Canfield, Planning Manager

**SUBJECT:** Johnson Valley OHV Area – Release of the Final Environmental Impact Statement by the United States Marine Corps, Twentynine Palms

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### **Summary**

The Final Environmental Impact Statement (FEIS) for Land Acquisition at Twentynine Palms Marine Corps Air Ground Combat Center in Johnson Valley identifies a preferred modified alternative (Alternative 6). Alternative 6 calls for the United States Marine Corps (USMC) to acquire approximately 146,000 acres of Johnson Valley Off-Highway Vehicle (OHV) Area from the Bureau of Land Management (BLM). Approximately 108,000 acres of the acquired lands would be reserved for exclusive military use, and approximately 38,000 acres would conceivably be available for OHV recreation ten months per year.

Johnson Valley is a popular OHV recreation area administered by the BLM Barstow Field Office. In 2008, the USMC originally expressed an interest in acquiring all, or a portion of, the Johnson Valley OHV Area to meet training requirements for a large-scale training range facility. The USMC prepared a National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) in support of the land acquisition. The FEIS was released in July 2012. The comment period for the FEIS ended August 27, 2012.

### **Discussion**

At the May 2011 Commission Meeting, the Commissioners toured the Johnson Valley OHV Area and received a report on the USMC planned expansion into the Johnson Valley OHV Area. The report discussed the USMC Draft EIS that was being circulated for public review and comment. The Draft EIS identified Alternative 6 as the preferred alternative and was selected because “it proved to be the optimal alternative considering operational and environmental factors together.”

In response to the open comment period for the Draft EIS, the OHMVR Commission submitted a comment letter in May 2011 (Attachment A).

The OHMVR Division submitted a comment letter during the public review period for the FEIS in August 2012 (Attachment B).

The next step in the NEPA process requires the Secretary of the Navy to release a Record of Decision (ROD). If the ROD selects the acquisition of public lands to meet USMC training requirements, the Department of the Navy would submit a completed withdrawal application to the BLM and take other required actions. Congress must approve any withdrawal with concurrence from the President in the final budget package.

Maryland Republican Representative Roscoe Bartlett, who chairs the Tactical and Air Land Forces Subcommittee of the House Armed Services Committee, authored an amendment to the defense authorization bill now in Congress that would limit the use of certain funds until the USMC submits a report detailing how the USMC will ensure continued access to OHV recreation in Johnson Valley. Captain Kendra Motz, a spokeswoman for the USMC, said the USMC is working on the report.

### **Commission Action**

For information only.

### **Attachments**

Attachment A - May 27, 2011 OHMVR Commission comment letter on Draft EIS

Attachment B - August 27, 2012 OHMVR Division comment letter on FEIS



DEPARTMENT OF PARKS AND RECREATION

Off-Highway Motor Vehicle Recreation Commission  
1725 23<sup>rd</sup> Street, Suite 200  
Sacramento, California 95816  
(916) 324-5801

Ruth Coleman, Director

May 27, 2011

Naval Facilities Engineering Command Southwest  
ATTN: 29 Palms DRAFT EIS Project Manager Chris Proudfoot  
MAGTFTC, MCAGCC  
Bldg. 1554, Box 788104  
Twentynine Palms, CA 92278-9104

**RE: Comment Letter regarding Draft Environmental Impact Statement for Land Acquisition and Airspace Establishment for Proposed Expansion of Twenty-Nine Palms USMC Air Ground Combat Center**

Dear Mr. Proudfoot:

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation Commission (Commission) appreciates the opportunity to comment on the Draft Environmental Impact Statement (Draft EIS) for the Department of the Navy's "Land Acquisition and Airspace Establishment" project, for the proposed expansion of the United States Marine Corps Air Ground Combat Center at Twentynine Palms, California (the "Combat Center").

This letter serves to address concerns the Commission has with regard to the impact the proposed project will have on the Californians whom the California Off-Highway Motor Vehicle Recreation Program (OHMVR Program) is established and mandated to serve. As stated in section 2.1 the Draft EIS identifies six action alternatives that would meet the Marine Corps' purpose and need for Military Expeditionary Brigade training capabilities. The Commission is concerned about the ramifications of all the proposed alternatives including specifically Preferred Alternative 6, and the long term impacts to OHV recreation in California.

The OHMVR Program has a substantial commitment and legislative mandate to ensure that the citizens of California have sustained opportunities for Off-Highway Vehicle (OHV) Recreation. The OHMVR Program has longstanding cooperative relationships with various Federal, State and Local agencies, and in this case specifically the Bureau of Land management (BLM), in support of, and providing financial assistance to, effectively managed OHV recreation areas.

The Johnson Valley OHV area, managed by BLM, with financial assistance from the OHMVR Program, is an irreplaceable resource that will be substantially lost for OHV recreation should the proposed Preferred Alternative be implemented. Johnson Valley, at 189,667 acres, is the largest OHV area of its kind, not only in California, but in the Nation. In short, Johnson Valley OHV area is one of the premier areas among public lands that are managed to provide OHV recreational opportunities in California.

Johnson Valley provides a unique and irreplaceable OHV opportunity to over 150,000 OHV recreationists per year that would be displaced should the proposed Preferred Alternative be approved and implemented. We foresee closure of an OHV area of this magnitude as contributing to a very serious public safety issue when those displaced recreationists seek other places to ride. Displaced recreationists would be required to travel longer distances to smaller facilities, thereby increasing user density levels that would likely lead to increases in OHV related accidents, increased environmental impacts and increased trespass onto non-OHV public lands and private properties. Compounding the above concerns would be the devastating economic impacts associated with the loss of the Johnson Valley OHV area as it currently exists. All of the proposed alternatives, including the Preferred Alternative, if implemented, will have a significant effect not only in the Mojave Desert Region, but also outdoor recreation in all of California. During uncertain economic times, large state budget deficits, and closing 70 State Parks, reduction in any recreation area, as stated above, will have long term negative effects to the citizens of California.

With California's continued population growth, and the increasing popularity of OHV recreation, coupled with ongoing reductions in areas available for OHV use, we are concerned with any proposal that effects OHV recreation, but specifically the proposed Preferred Alternative 6 acquisition. Alternative 6 includes 146,667 acres of the 189,470 acres that is currently Johnson Valley OHV area. Of the 146,667 acres to be acquired, only 22%, or 38,137 acres, would be available for recreation 10 months of the year. This is unacceptable.

The OHMVR Program is charged by California's Legislature with the duty to support "sustained" OHV recreation activities for the citizens of California. Losing the largest and one of the most visited OHV venues in the nation will have a profound impact on maintaining that directive.

We recognize the many challenges facing the Marines and our Military during these tumultuous times and appreciate the security our forces provide for the citizens of the United States. We also recognize that you are mandated by the President and Congress to maintain a national military program that adapts training, management, and operational strategies to keep current with the various global threats which includes providing venues to conduct training. However, it is our mandate as stated above to support OHV recreation in the State of California. The Commission thanks you for taking the time to listen to our concerns and answering our questions during our OHMVR Commission Meeting in Ontario California on May 25.

Mr. Chris Proudfoot  
May 27, 2011  
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In conclusion, the Commission strongly opposes all alternatives that reduce OHV recreation at Johnson Valley OHV area. The alternatives as written are unacceptable for our constituents. The Commission encourages the Marine Corps to look into other alternatives that would facilitate its training requirements without resulting in the loss of the important recreational resource at Johnson Valley. To the extent the OHMVR Commission may assist in this effort, we stand ready to do so.

Thank you again for the opportunity to provide comment on the Draft EIS document.

Sincerely,

A handwritten signature in blue ink, appearing to read 'E. Lueder', with a long horizontal flourish extending to the right.

Eric Lueder, Chairman  
Off-Highway Motor Vehicle Recreation Commission

cc: Senator Diane Feinstein  
Senator Barbara Boxer  
Congressman Jerry Lewis



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Off-Highway Motor Vehicle Recreation Division  
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Janelle Beland, Acting Director

August 27, 2012

Naval Facilities Engineering Command Southwest  
ATTN: 29 Palms EIS Project Manager, Chris Proudfoot  
1220 Pacific Highway  
San Diego, CA 92132-5190

**RE: Comment Letter regarding Final Environmental Impact Statement for Land Acquisition and Airspace establishment for Proposed Expansion of Twenty-Nine Palms USMC Air Ground Combat Center**

Dear Mr. Proudfoot,

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division appreciates the opportunity to comment on the Twenty-Nine Palms USMC Air Ground Combat Center Land Acquisition Final Environmental Impact Statement (FEIS). The OHMVR Division has a legislative mandate to ensure the citizens of California have sustainable opportunities for off-highway vehicle (OHV) recreation. The OHMVR Division continues to have concerns over the possible impact of the proposed land acquisition on the Johnson Valley OHV area.

The Johnson Valley OHV area was established as part the 1980 California Desert Conservation Plan. At 189,667 acres, it is the largest OHV area of its kind. The Johnson Valley OHV area, managed by the Bureau of Land Management (BLM), with financial assistance from the OHMVR program, is an irreplaceable resource that will be substantially lost for OHV recreation should the land acquisition identified in the FEIS be implemented. Displaced recreationists would be required to travel farther to smaller OHV areas, potentially leading to an increase in OHV related accidents, increased environmental impacts, and increased OHV trespass on neighboring non-OHV public lands. Additionally, the loss of Johnson Valley OHV area would have a devastating economic impact to the entire Mojave Desert region.

The FEIS includes an *Appendix M – Displaced Off-Highway Vehicle Recreation Study*. This study appears to be focused solely on displaced recreation impacts to the desert tortoise, with some reference to other special-status species, and to effects on low density residential communities. Such a limited focus is inadequate because it fails to consider the full suite of effects such displaced recreation could have on neighboring land managers as well as recreationists. The study does not consider state-listed species such as the Mojave Ground Squirrel and in some cases relies on decades old species data. The effects of displaced OHV recreation on the surrounding desert lands and environment deserve a more thorough examination before any reduction of the Johnson Valley OHV area is implemented.

Chris Proudfoot, EIS Project Manager  
August 27, 2012  
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The OHMVR Division respectfully recommends the USMC comprehensively studies the impacts of displaced OHV recreation on the region and to ultimately pursue other options that would meet their training needs without impacting the important recreational resource of Johnson Valley OHV area.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Canfield', with a long, sweeping horizontal line extending to the right.

Dan Canfield, Planning Manager  
OHMVR Division

cc: Phil Jenkins, OHMVR Division  
Acting Deputy Director